

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Joseph Foresta :  
Plaintiff : CIVIL ACTION  
v. :  
: 2:23-cv-01379-JFM  
Airbnb :  
Defendant :  
-----

**STIPULATION TO EXTEND PLAINTIFF'S TIME TO  
RESPOND TO DEFENDANT'S 12 (b) (2) MOTION TO  
COMPEL ARBITRATION TO STAY PROCEEDINGS AND TO  
DISMISS FOR LACK OF PRESONAL JURISDICTION**

It is hereby Stipulated and Agreed between Joyce Ullman, attorney for Plaintiff, Joseph Foresta and Kelly Fox, attorney for Defendant, Airbnb that Plaintiff's request for an extension of time to June 1, 2023 to respond to Defendant, Airbnb's 12(b)(2) Motion be Granted. In support thereof Plaintiff alleges the following:

- 1 On May 4, 2023, Defendant filed a 12(b)(2) Motion to Compel Arbitration, to Stay Proceedings and to Dismiss for Lack of Jurisdiction.
- 2 Plaintiff's response is due by May 18, 2023.
- 3 The issues raised in Defendant's Motion and the number of cases cited by Defendant requires an extensive amount of time to research.
- 4 Due to Plaintiff counsel's Trial schedule and Plaintiffs' counsel is a sole practitioner, she has not had sufficient time to prepare the response to Defendant's Motion.

WHEREFORE, Plaintiff seeks this Court approve this Stipulation and Grant the Plaintiff until June 1, 2023 to respond to Defendant's 12(b)(2) Motion.

Respectfully submitted,

Date: May 16, 2023

*Joyce Ullman*

Joyce Ullman, Esquire  
Attorney for Plaintiff, Joseph Foresta

Date: May 16, 2023

*Kelly Fox*

Kelly Fox, Esquire  
Attorney for Defendant, Airbnb